

Friends of Squaw Valley

PO Box 2823

Olympic Valley, CA 96146

www.friendsofsv.org

March 24, 2014

Placer County, Planning Services Division

Attn: Maywan Krach, CD Technician

3091 County Center Drive #190

Auburn, CA 95603

Via email: cdraecs@placer.ca.gov

Re: Notice of Preparation (NOP), Village at Squaw Valley Specific Plan Environmental Impact Report (EIR)

To Whom It May Concern:

Thank you for the opportunity to comment on the NOP for the Village at Squaw Valley Specific Plan EIR.

Friends of Squaw Valley is a group of Squaw Valley residents, skiers, snow boarders, and business persons who are concerned about the future of Squaw Valley. We were formed in response to the proposed project. Our mission is to advocate for environmental sustainability, economic viability, and development that is aesthetically compatible with our community's character.

Our comments on the NOP follow and we also incorporate by reference the Sierra Watch NOP comments.

Project Description

The NOP Project Description does not detail many of the components of the project, making it difficult for the public to be aware of its full scope to comment on. For nout, what uses will actually be included in the Mountain Adventure Camp (MAC), how many stories will be permitted in individual buildings and what will be the height of each story? Other Project Description inadequacies are described in detail in the Sierra Watch NOP.

The Specific Plan itself is vague on some aspects of the project, making it impossible to include them in the NOP or EIR Project Descriptions. As a result, we wonder if the impact analysis in the EIR will be able explore impacts adequately

For example: The Public Facilities and Utilities chapter of the Specific Plan notes that water sources outside the Valley floor may or may not be used (SP page 6-5, para 4)

and a new water company may or may not be formed (SP page 6-3, para 5). A new 0.7 million gallon water tank is proposed in the Specific Plan (SP Figure 6-1), but the NOP notes that a 1.5 million gallon tank may be needed (NOP page 9). Off-site parking areas may or may not be provided (SP page 5-9, para 3). A transit center is planned, but not described. An emergency vehicle access connecting to the Resort at Squaw Creek may or may not be constructed (NOP, page 8). The Concept Plan is included as an illustration of one potential outcome, yet it is inconsistent with the Specific Plan text in some areas (width of Squaw Valley Creek open space, no parking structures shown).

The EIR Project Description and individual sections of the EIR must ferret out the actual project description in these and all project proposals and discuss the relevant impacts. Where the Specific Plan is vague as to the project description, the EIR must assume significant and unavoidable impacts will occur in relevant impact areas since it will be unclear how the proposal addresses the potential impacts.

Finally, the NOP continually compares the current Specific Plan to the previous submittal. The EIR should not include this comparison in the project description nor in the impact analysis. This is confusing to the public as there is only one project on the table, the current submittal.

POTENTIAL ENVIRONMENTAL IMPACTS

It is unclear whether or not the EIR will be considered a Program EIR or a project specific EIR. Regardless of the term used, it is important to our members and the public to be able to fully understand the impacts of the project at build out. This requires a level of specificity in every section of the EIR that assumes a built out project, not just the adoption of a Specific Plan document.

Land Use

The proposed Specific Plan requires amendments to the Placer County General Plan and the Squaw Valley General Plan and Land Use Ordinance (SVGPLUO) and, as a result, is inconsistent with these plans. We believe it is also inconsistent with the Squaw Valley Design Guidelines as they will also be revised if the project is approved. These documents have provided guidance to development in the Valley for up to 30 years. The project inconsistencies with these adopted plans should be described in detail, policy by policy, guideline by guideline, so that we can understand the degree of divergence from them that will result. Most of the policies and guidelines were adopted to avoid environmental impacts and, as a result, project inconsistencies with them would constitute land use impacts.

A comparison of existing and proposed zoning by type and location is needed. Impacts related to zoning which will be increased in intensity should be discussed. For instance, existing Forest Recreation zones have been increased in density in some areas including adjacent to the Shirley Canyon Trailhead where Heavy Commercial zoning is proposed for the maintenance area.

Population, Housing, and Employment

The EIR should identify a “worst case” residential population and mountain use at build out of the project. This will entail determining the following:

- Existing population and mountain use and other visitation by season (including employees)
- Projections of additional growth in these same categories that will occur at project build out and incrementally by phase.
- Peak use days which could result based on the project proposals should also be estimated.

The EIR should then determine if the adopted residential and mountain holding capacity in the Squaw Valley General Plan has already been exceeded or will be exceeded combined with project build out.

In addition, we are concerned that a project of this size (a new city) may have substantial growth inducing impacts in neighboring areas such as Truckee and the Tahoe Basin, altering our region’s quality of life. This possibility needs to be explored in detail in the EIR including what direct and indirect impacts might result from any induced growth including air quality, water quantity and quality, traffic, and greenhouse gas emission impacts as well as increased demand for housing and other land uses. This is a critical potential impact and we request that the analysis be meaningful and in depth, quantified wherever possible.

Economic Impacts

Related to project growth are the potential economic impacts of the proposed project which could result in physical impacts in other communities in the region. For instance, will the project monopolize so much of the market potential for visitor housing or other market sectors (such as retail businesses, commercial recreation, etc.) that these sectors in Truckee or the Tahoe Basin will be negatively impacted, resulting in physical impacts due to vacancies, etc. Alternately, will initial phases involve only real estate sales and how will the success/lack of success of these sales affect the financial ability to support the ski resort? Is there a market for the amount of and type of residential/hotel uses proposed or is there the potential for a “ghost town” effect? Will the commercial and recreational aspects of the proposal be supportable by the ultimate proposed residential mix? At what phase of build out will they be supportable? What governmental fiscal impacts will result if a full mix of uses proposed does not come to fruition? What mix of land uses should be required by phase to ensure a healthy land use as well as economic mix?

The economic impacts of the project should be analyzed in depth in the EIR, prepared by consultants with expertise in this field.

Visual Resources

The expected aesthetic and visual resource impacts of the project are of great concern to Friends of Squaw Valley. The Specific Plan text and its Appendix B could result in a project of a design and scale not in keeping with the existing village, blocking or substantially altering the spectacular and iconic views to the mountain and slopes, with bulky buildings and shaded public gathering areas and walkways. These features are not consistent with the Squaw Valley General Plan and Land Use Ordinance or the Squaw Valley Design Guidelines which were adopted in part to avoid negative aesthetic impacts. As a result, these documents should be used to evaluate visual impacts. We have attached some of their requirements which relate to these issues (Attachment A).

The following questions should be answered in the EIR:

- Will the project have a substantial adverse effect on a scenic vista?
- Will the project substantially degrade the visual character of the site and its surroundings?
- Will substantial new light or glare be created?

More specifically, to assist in answering the questions above:

- Will important views be blocked from Squaw Valley Road, from neighboring residences within and outside the village, and from within the existing and future village open areas?
- Are open spaces and walkways within the Village Core wide enough to keep important views open?
- Will the build out of the project at maximum heights alter views to the mountain and slopes from important viewing points including Squaw Valley Road, Village open spaces, existing homes and businesses, and future viewing points within the expanded village and Village Commercial-Residential area?
- Will the potential bulk and height of proposed buildings in the Village Commercial area overwhelm and impact the visual value of the existing village?
- Are policies and guidelines within the SVGPLUO and Squaw Valley Design Guidelines which are intended to avoid visual impacts and view disruption inconsistent with project proposals?

In order to answer these questions, the following analyses will be needed:

- Numerous cross sections through various project points and the surrounding vista and viewing points at build out.
- Photo visual simulations of the project at maximum height and width at build out from and to the same vista and viewing points.
- Story poles on site to demonstrate building heights.
- Cross sections and visual simulations should include the MAC.

The following mitigation measures should be evaluated to reduce impacts to surrounding views to and from the project area and to comply with the SVGPLUO and Design Guidelines:

- Methods to open views and eliminate shading during most of the day (10 am to 4 pm), such as stair stepping of buildings and lowering maximum heights.
- Methods to reduce shadowing of open areas and adjacent buildings such as orientation of buildings, limits on height, distance between buildings, and stepping of building facades.

We recommend lowering the maximum building heights to a consistency with the SVGPLUO and SV Design Guidelines, the creation of wider plazas and walkways, architecture that is human in scale – stepping up in height from the public areas, north south orientation of buildings for maximum sun exposure, and specific sun exposure criteria. Without specific design criteria in these areas within the Specific Plan or mitigation plan, it cannot be assured that mitigation of related impacts will result.

Public Facilities and Utilities/ Water Supply

As discussed previously, unless the details of proposed public facilities and their financing are made more specific in the Plan, it is unclear what the proposals are and impacts including ability to serve cannot be accurately evaluated.

For example:

- The extent and locations of the proposed well system proposed are not specifically set forth. How will any new wells impact existing wells? How can future unforeseen impacts be mitigated after project approval? Should bonding be required to mitigate potential impacts to existing users?
- The amount of water demand to be generated by the project has not been included in the Specific Plan. What high generation water uses are proposed (such as the water park) and what impact will they have on water supply and storage needs?
- The water supplier has not been determined (SP page 6-3, para 5). If a second water company is created, will this have negative impacts to the management of the alley aquifer?
- A new 0.7 million gallon water tank is proposed in the Specific Plan (SP Figure 6-1), but the NOP notes that a 1.5 million gallon tank may be needed (NOP page 9).
- Off-site parking areas may or may not be provided (SP page 5-9, para 3).
- A transit center is planned, but not described.
- An emergency vehicle access connecting to the Resort at Squaw Creek may or may not be constructed (NOP, page 8).
- The details of the proposed sewer line system must be determined and potential impacts to the creek in the event of breakages and during construction must be

analyzed. The adequacy of the sewer main to the TTSA to handle project and cumulative impacts must be evaluated.

- Drainage plans must be presented in greater detail to understand potential impacts and not passed on to future study.
- Propane. The EIR must quantify the expected propane need at full build out. The size and location of storage tanks, and expected delivery truck traffic. Impacts to be addressed should include explosion and leakage risks and methods to avoid this risk.
- Fire. Increased demand for fire protection facilities and staffing must be determined at build out and by phase and particular to each type of land use proposed and facility/ staffing costs identified.
- Parks. The NOP notes that a previously proposed park is no longer part of the project proposal. While a linear park along the creek may meet some of the parks and recreation obligation of the project, the entire requirement needs to be defined including the need generated by category of residence: private residences, condo-hotels, hotels, etc.

The Specific Plan Financing Strategy (Specific Plan page 8-17) is vague as to how these public facilities and utilities will actually be paid for...*"Some regionally serving public facilities may be funded by a larger fee program that includes areas both within and outside the Plan Area."* (Policy IM-6-1)...*"The costs for public facilities will be allocated as much as possible based on a project's fair share of required improvements."* (IM-6-2)...*"A community facilities district may be established to help fund the construction and/or acquisition of backbone infrastructures and facilities..."* (IM8-6-6 para 4) (Emphases added.) This vagueness on the actual public facilities proposed, their cost, and the plan for funding them makes it impossible to tie down the project description related to public facilities and therefore it is impossible to discuss potential impacts.

The details of the proposed public facilities and financing must be ferretted out or impacts must be determined to be significant and unavoidable. Deferring these impact discussions to further study or relying on future financing plans or decisions on the components of major public utilities to be developed would be inappropriate. This would leave us without an understanding of whether or not the project can be adequately served by facilities as basic as water and what impacts might result.

Additionally, the following questions should be answered in the EIR:

- Will growth inducing impacts result from construction of new public facilities and utilities?
- Will direct and indirect impacts result from the physical construction of each of the proposed facilities and where they will be located in relation to other land uses?
- There is discussion of the potential for an offsite water line to be extended from the Martis Valley to serve the project. If such a proposal is expected its impacts must be fully analyzed in depth.

- There has been discussion of a natural gas line to be extended to the project also, is this part of the project description and what impacts will result?

Noise

The noise impacts of both substantial additional visitor and residential traffic as well as construction traffic which will continue for perhaps 25 years are also concerns of our membership.

Placer County Noise Ordinance standards are currently being exceeded at residences along Squaw Valley Road. As a result, any increase in traffic will result in a significant project and/or cumulative impact. Measures to avoid this impact which do not cause further indirect impacts must be identified or the scale of the project must be reduced.

A full noise analysis is needed evaluating project and cumulative traffic and construction noise impacts at various points in the project build out period as well as those of each of the project alternatives.

Transportation and Circulation

A full project and cumulative traffic and parking impact analysis is needed. Because existing target traffic levels of service may have already been exceeded, it is likely that traffic impacts may not be mitigated to below the significant level. Regardless, all available mitigation measures must be explored and the project impacts must be mitigated to the maximum degree possible.

Hydrology and Water Quality

Squaw Creek water quality is already impaired (excessive sediment) and quantity (deficient in stream flow). Further water extraction and increased development will clearly decrease flows and water quality. Water quality and quantity impacts need to be fully analyzed including a full TMDL assessment. The BMP program listed in the Specific Plan's Drainage Plan is generic; it cannot be assured that these generic measures will mitigate potential water quality impacts. Quality of snow melt from snow removal melt areas is also a concern and should be analyzed. A long term monitoring program should be part of the mitigation plan to ensure that performance criteria are met over time.

A more ambitious restoration of Squaw Creek should be analyzed as a mitigation or design alternative as this will likely be needed to address project and cumulative impacts to the creek. (See NOP letter from David Stepner, page 5.) As the creek is currently impacted, any increase in impacts must be considered significant.

A full wetland delineation and impact analysis is needed in the EIR.

Biological Resources

The US Fish and Wildlife Service recently addressed critical habitat for the endangered yellow-legged frog. The EIR must fully address this concern especially since Shirley Canyon encroachments are proposed. Sittings of the yellow-leggedfrog in Shirley Canyon have recently occurred.

Special attention should be given to the impacts which will result in the wooded proposed Village Neighborhood area.

Cultural Resources

As the NOP described, the project area is considered archaeologically sensitive (NOP page 11). As a result, a full cultural resources assessment of the project area is required. It is likely that prehistoric sites are present under existing paving. As a result, a mitigation plan should be identified to ensure that these types of resources are not destroyed as construction proceeds and the possibility that construction areas will need to be altered should be anticipated.

In addition, two of the three Olympic Games buildings are proposed for demolition. The EIR consultants should be sensitive to the fact that local criteria are permitted to be used in determining whether or not buildings are historically significant. The community clearly feels that these buildings are historically significant and that their loss would result in a significant impact. (Squaw Valley General Plan: *"It is the intention of these regulations to preserve existing attractions in this district..."* (page 85, para 2).

Geology, Soils, and Seismicity

A full geotechnical impact and mitigation analysis is needed, particularly due to the seismicity in the area.

Wildland Fire, Emergency Response, and Evacuation

The valley has only one emergency egress (Squaw Valley Rd. to Highway 89). Both emergency vehicle access to the valley and evacuation out of the valley may be impossible during an emergency event. A full emergency response, evacuation analysis, and safety mitigation plan is needed in the EIR. It will be important to determine if adequate fire, police, emergency service, and road infrastructure will be available to serve the project via its public facility/service and financing proposals at each phase of build out.

Wildfire in valley and in the Tahoe Basin is always imminent during dry summers. We refer you to the Sierra Nevada Publication: Dangerous Development, Wildfire and Rural Sprawl in the Sierra Nevada as a resource on this important issue.

Air Quality

We refer you to the Sierra Watch comments on this subject.

Greenhouse Gases and Climate Change

We refer you to the Sierra Watch comments on this subject.

Mitigation Measures/ All Available Mitigation

We are particularly concerned that all available mitigation be explored and that all impacts be mitigated to the maximum degree possible. In subject areas where we expect that impacts may be unavoidable (such as traffic, noise, air quality, greenhouse gas emissions, water quality) a special effort will be needed to identify mitigation measures or reduced scale alternatives/

CEQA requires that all feasible available mitigation be identified. In fact, an EIR must explore all available mitigation measures even if some are not selected (CEQA Guidelines Section 15126.4 (a) (1) (B)). Thus, the EIR may not "drop the ball" and conclude that an impact is unavoidable when, in fact, mitigation measures may be available. It is the responsibility of the County to mitigate these impacts to the maximum degree possible even if they cannot be mitigated fully, rather than just stating: "no measures are available". And, it may be necessary to create a project alternative (such as reduced scale) to address impacts which cannot otherwise be mitigated.

We recommend that budget be retained to address the effectiveness of additional measures or project alternatives which may be recommended by the public in key impact areas after the DEIR has been released. This will ensure more than just a cursory attention be given to creative ideas which may come up after review of the detailed reports by the public.

Cumulative Impacts

The project combined with other similar projects in the region plus background planned additional growth in the Valley will result in cumulative impacts in any number of the impact areas covered by the EIR, particularly since the project will likely build out over a long period of time. This is the largest project proposed in the Tahoe regions for decades. As a result, each impact area discussion should include a detailed cumulative impact analysis, not the cursory review often found in EIRs. Cumulative impacts to water supply, traffic, noise, wastewater treatment, air quality, and greenhouse gases are of particular concern.

Please note that the Resort at Squaw Creek is approved for a phase 2 development, PlumpJack has submitted an expansion plan, and the 29 acre Poulsen family property is for sale. Background growth already planned in the Valley and the region must also be included in the analysis.

Cumulative mitigation measures should be recommended including phasing of development approvals based on the ability for the project and regional governments to meet performance standards or provide mitigation at various check points in time.

Alternatives

One of our key interests is the creation of the environmentally superior alternative. A project of this scale is expected to have numerous significant and unavoidable impacts. As a result, the alternatives to be discussed in the EIR will be of critical importance to our organization, the public, and the decision makers. We hope that the EIR will be able to identify alternatives that mitigate or substantially lessen otherwise unavoidable impacts, lessen other impacts, and foster informed decision making. In order to ensure this outcome, the Alternatives section should include a full range of alternatives in both design and scale. In addition, each alternative should be discussed and compared in detail and impacts quantified where possible, not in the cursory form often seen in EIRs, in order to be useful to the decision makers and the public. Where specific subconsultant reports are contracted (such as noise, traffic, economic, visual) they should include detailed analysis of the project alternatives.

CEQA requires that the alternatives in an EIR must feasibly attain most of the basic project objectives while avoiding or substantially lessening the project's environmental impacts. It is unclear what will be used in the EIR as the project sponsor's objectives. It appears that they are those listed on page 1-1 of the Specific Plan (para 2) which include implementation of the Squaw Valley General Plan and Land Use Ordinance and ensuring that the area has *"the capacity to serve and house the optimum number of tourists, visitors, and residents...without adversely impacting the unique aesthetic and environmental assets of Squaw Valley (SVGPLUO, page 4)"*. If this is the primary sponsor objective, a very wide range of reduced scale and design alternatives would be justified in order to avoid adversely impacting these "unique aesthetic and environmental assets". In addition, we request that alternatives be included which explore a wide range of planning options, rather than just project proponent oriented alternatives. This is important because the project is first and foremost, as proposed, major revision to the Squaw Valley General Plan Land Use Ordinance and Design Guidelines which are long range community planning tools that should represent the community's goals and vision for its future.

Thank you for the opportunity to comment. Please continue to keep us on the contact list for all events or notices relating to the project or its environmental review.

Sincerely,
Laurie Oberholtzer
Consulting City and Environmental Planner
for
Friends of Squaw Valley

Attachment A
Squaw Valley General Plan, Land Use Ordinance and Design Guidelines

Policies and Guidelines
Relevant to Critical Village Planning Design Issues

Friends of Squaw Valley has reviewed the Squaw Valley General Plan, Land Use Ordinance, and Design Guidelines as they relate to the proposed KSL project. It is a lengthy body of regulations. Because the project is so large, we have found that it is most useful to look at the “big picture” design policies and guidelines.... those addressing town planning level design issues such as the mass, height, scale and feeling and form of the community we envision. We have listed what we view as the critical “big picture” design guidelines and policies below and provided a brief analysis of the Specific Plan’s inconsistency with them where appropriate.

Height, mass, scale of buildings/ Views/ Sun Access

1. Section 220.16 of the Placer County Code (page 87 of the SVGPLUO) dictates height limitations in the Village Commercial District which is what much of the plan area is currently zoned. It states that ***“height limits shall be set for particular developments through the design review process where other developed or developable parcels are affected by a proposed building.”***

Further direction is then given in the SV Design Guidelines:

2. SV Design Guidelines, Building Design Guideline 1, page 21: ***“Building design should compliment and harmonize with neighboring buildings.”*** Height and scale are listed as 2 ways to achieve compatibility.
3. SV Design Guidelines, Building Design Guideline 3, page 21 (in part): ***“A building or project should be in scale with its immediate surroundings and with the area.”***
4. SV Design Guidelines, Site Plan Design Guideline 4, page 11: ***“Buildings should be sited with consideration given to sun and shade...”***
5. PUD projects: ***“In most cases, the 35 foot height limit shall prevail, however, where the applicant can demonstrate: 1. That the establishment of a greater height limit will result in a reduction in land area disturbed by such developments; 2. That the project, as proposed, will reduce the visual impact of a similarly sized project which would meet the normally required 35 foot limit; 3. That the additional height requested will not create additional adverse impacts on public services nor on the environment; 4. That the buildings proposed will not adversely affect the view from adjoining development, nor adjoining developable land; and 5. That the buildings proposed will not interrupt adjoining properties potential for solar access.”*** (Land Use Standards 137.13, page 81, SVGP)
6. Heights in other zones such as High Density Residential and Heavy Commercial are specifically limited to 30 to 35 ft. (Land Use Standards 137.12, page 81, SVGP)

7. The Village Commercial district text in the Squaw Valley General Plan on page 85, para 4, states that high density development may be justified but that: ***“At the same time, the maintenance of the principal views of the mountain peaks and hillsides must be retained to the maximum degree possible. It is therefore intended that these regulations establish pedestrian open space requirements, floor area ratios, and open space ratios which provide the framework for a pedestrian and view oriented urban design.”***
8. SV Design Guidelines, Site Design Guideline 2, page 10: ***“Buildings should be sited so that they do not interrupt the flow of the skyline as viewed from common vantage points.”***
9. SV Design Guidelines, page 10, Site Plan Guideline 1: ***“The existing natural features of a site should be retained and used to advantage. The incorporation of features such as creeks, trees, natural slope, rocks and views often leads to a more interesting and unusual design.”***

The Squaw Valley General Plan and Land Use Ordinance and Design Guidelines clearly envision a village that harmonizes with surrounding development and which has a focus on view oriented urban design and that does not interrupt views and access to sunlight. The Specific Plan is not consistent with the height, mass, scale, view, and sunlight protection guidelines in the SVGPLUO and Design Guidelines including those listed above. The Specific Plan should be evaluated against these and other related aesthetic land use standards in the SVGPLUO and Design Guidelines for consistency and recommend appropriate mitigation measures. This determination should not be left to the discretion of decision makers; rather a recommendation should be offered by the EIR consultants similar to those in other EIR sections.

Parking

The Squaw Valley General Plan parking discussion begins on page 45 and calls for: Retention or re-creation of 3000 day skier parking spots (SVGP page 47 paras 2,3). Replaced day skier parking specifically cannot be provided in a parking structure at the entry to the Valley (SVGP page 48, para 3).

The Squaw Valley Design Guidelines state that ***“All off street parking shall be located on the same property as the major land use it is intended to serve, unless located within a parking structure...”*** (Page 14, Guideline 3)

Placer County Land Use Ordinance parking standards:

1 space per bedroom for hotels

.75 spaces per bedroom per residential unit

1 space per 300 sq ft per gross square foot of commercial space.

These ratios can be altered by the DRC and the Planning Commission if part of a PD project.

The parking proposals in the Specific Plan must be analyzed for consistency with each of the parking standards in the SVGPLUO and Design Guidelines.

History

The Squaw Valley General Plan states: ***“It is the intention of these regulations to preserve existing attractions in this district...”*** (Page 85, para 2)

Two Olympic era buildings are proposed to be demolished.

Pedestrian Circulation

The Squaw Valley General Plan calls for a pedestrian orientation in the Village Commercial District (page 84, para 5): ***“The intent of creating a “Village Commercial” land use district is to allow for and guide the development of an environment that will be interesting to people on foot, that would remove or reduce pedestrian competition with the automobile.... attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area.”***

Squaw Valley Design Guidelines: ***“In the Village Commercial District special emphasis will be placed on the provision for pedestrian open space.”*** (Guideline 9, page 11)

The pedestrian walkways planned to be as narrow as 15 feet and the main plaza shown on the Concept Plan are not expansive enough to meet these goals.

Zoning/Land Use Mix Issues

Density and Intensity:

The Village area is currently zoned largely Village Commercial with additional areas of Low Density Residential, High Density Residential, Heavy Commercial, Forest Recreation, and Conservation Preserve. The KSL proposal replaces this zoning with new zoning districts. It is difficult to compare the two, though in some areas increases in density are proposed.

Land use and zoning densities are typically expressed as a maximum number of units or square footage of buildings, and this is the case in the Squaw Valley General Plan and Land Use Ordinance. The final units/square footage permitted when a specific project is proposed is normally based on the ability of a proposed development to meet all of the General Plan policies and adopted standards and guidelines while not exceeding environmental and public facility constraints. Thus, whether or not the KSL project is consistent with current land use and zoning densities must be determined in concert with other policies and environmental review.

Mixed Uses and Cohesiveness with the Existing Village:

Much of the plan area is currently designated Village Commercial in the General Plan where a mix of land uses is permitted and encouraged ***“to allow for and guide the development of an environment that will be interesting to people on foot, that would remove or reduce pedestrian competition with the automobile.... attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area. As the focal point of a destination ski resort, development occurring within this district must be equally oriented to the ski hill and the major pedestrian and vehicular access points. Commercial and tourist residential uses are encouraged to be provided within the same structure. The area so designated in the Squaw Valley General Plan has strong potential for complementary development, attracting both residents and visitors to the village core and thus promoting the social and economic vitality of the entire area.”*** (SVGP Pages 84, para 5)

We do not believe that the Mountain Adventure Camp structure at 90,000 plus square feet, in a separate single purpose type structure, with a mixture of retail and recreational type uses is consistent with this goal of a mix of land uses within the village core.

Balancing Land Use Types:

The Squaw Valley General Plan recognizes that a vibrant Village will require additional visitors lured by new accommodations and summer recreation activities. Yet, it notes that ***“At the same time, the quality of the permanent residential community must not be adversely affected by the detrimental effects of short term, high intensity use by a transient, seasonal population.”*** (SVGP Page 5, para 3) and that: ***“...it is apparent that rational limits must be placed on the development of Squaw Valley. In an ecologically sensitive area such as Squaw Valley, development beyond a certain capacity will damage the recreational and living experience of current and future users. A potential conflict exists between permanent residents, enjoying their community, and land owners profiting from a greater amount of tourist dollars flowing into the area. The construction of additional tourist related recreational development, though it may bring economic gains to many, can result in a diminished ability for the local residents and visitors to enjoy the area.”*** (SVGP Page 7, paras 1 and 2)

These goals make it clear that the analysis in the EIR of project created growth of the scale proposed and its direct and indirect impacts will be critical to understanding whether or not the proposal is larger than the holding capacity of the valley, environmentally and socially.